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18 Attorney for Defendants
19 Duc Nguyen and Marcella Zuniga

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA

22
23 GERALD L. RIGHETTI,
24 Plaintiff,

25 v.

26 DR. DUC NGUYEN; IDA GUZMAN;
27 MARCELLA ZUNIGA; and DR. NEIL
RICHMAN,

Case No. C-11-2717 EMC

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER EXTENDING
SUMMARY JUDGMENT AND CASE
MANAGEMENT DEADLINES**

**JOINT STIPULATION AND PROPOSED ORDER EXTENDING SUMMARY
JUDGMENT AND CASE MANAGEMENT DEADLINES**

Plaintiff Gerald Righetti ("Plaintiff") and Defendants Duc Nguyen, Marcella Zuniga, and Neil Richman ("Defendants") submit this joint stipulation requesting that the Court modify the current summary judgment and case management deadlines.

WHEREAS, on June 24, 2013, the Court entered a Civil Minutes Order (Dkt. No. 139) setting the following schedule: (1) Defendants' dispositive motions for summary judgment shall be filed by October 17, 2013; (2) Plaintiff's opposition shall be filed by November 7, 2013; (3) Defendants' replies shall be filed by November 21, 2013; (4) an updated joint Case Management Statement shall be filed by December 5, 2013; and (5) the hearing on Defendants' motions for summary judgment and further Case Management Conference shall be set for December 12, 2013;

WHEREAS, the Plaintiff and Defendants have reached an agreement on the extension of these deadlines to accommodate the schedules of the parties and their respective counsel;

NOW, THEREFORE, the undersigned parties hereby respectfully request that this Court approve and order the following revised schedule :

1. Defendants' dispositive motions for summary judgment shall be filed by November 14, 2013;
2. Plaintiff's opposition to Defendants' motions shall be filed by December 12, 2013;
3. Defendants' replies shall be filed by January 6, 2014;
4. The parties shall file an updated joint Case Management Statement by January 23, 2014 or seven calendar days before the date set by the Court for the Case Management Conference; and
5. The Court will set Defendants' summary judgment motions for hearing on and the further Case Management Conference for January 30, 2014 or as soon thereafter as

1 the Court's calendar permits.

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3 Dated: October 4, 2013

DARIN W. SNYDER
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6 By: 
Rachel Zuraw
Attorney for Plaintiff Gerald L. Righetti

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9 Dated: October 4, 2013

ROBERT SANFORD
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12 By: _____
Robert Sanford
Attorney for Defendant Neil Richman

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15 Dated: October 4, 2013

MICAH C. E. OSGOOD

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18 By: _____
Deputy Attorney General
Attorney for Defendant Duc Nguyen &
Marcella Zuniga


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2 Dated: October 4, 2013

DARIN W. SNYDER
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6 Rachel Zuraw
7 Attorney for Plaintiff Gerald L. Righetti

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9 Dated: October 4, 2013

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SUPPLE & CANVEL LLP

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12 By: _____
13 Robert Sanford
14 Attorney for Defendant Neil Richman

15 Dated: October 4, 2013

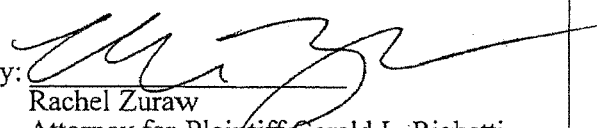
MICAH C. E. OSGOOD

16
17 By: _____
18 Deputy Attorney General
19 Attorney for Defendant Duc Nguyen &
20 Marcella Zuniga
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1 the Court's calendar permits.

2 Dated: October 4, 2013

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O'MELVENY & MYERS LLP

3 By: 
Rachel Zuraw
Attorney for Plaintiff Gerald L. Righetti

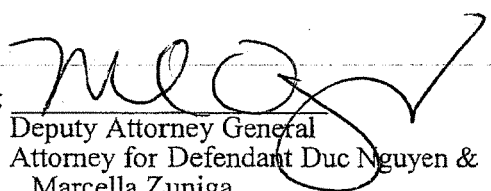
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9 Dated: October 4, 2013

ROBERT SANFORD
SUPPLE & CANVEL LLP

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Robert Sanford
Attorney for Defendant Neil Richman

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14
15 Dated: October ⁷/₄, 2013

MICAH C. E. OSGOOD

16 By: 
Deputy Attorney General
Attorney for Defendant Duc Nguyen &
Marcella Zuniga

**[PROPOSED] ORDER EXTENDING
SUMMARY JUDGMENT AND CASE MANAGEMENT DEADLINES**

THIS MATTER came before the Court for consideration upon the Joint Stipulation and Proposed Order Extending Summary Judgment and Case Management deadlines filed by Plaintiff Gerald Righetti and Defendants Neil Richman, Duc Nguyen, and Marcella Zuniga in *Righetti v. Nguyen et al.*, C-11-2717 EMC (N.D. Cal.). The Court, having considered the Motion, the record, and the representations of counsel, finds good cause to grant the Motion.

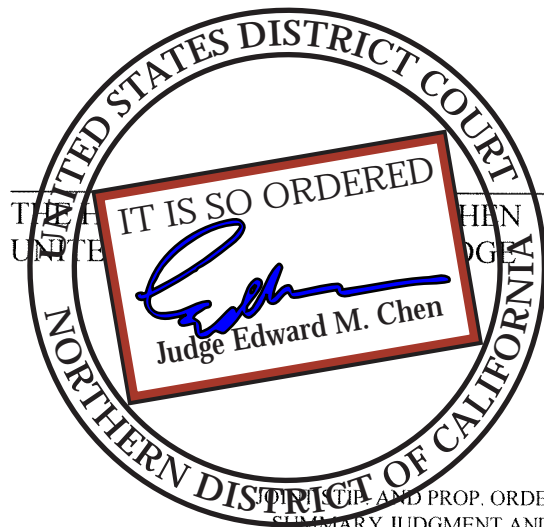
Accordingly, it is hereby ORDERED AND ADJUDGED that:

The Joint Stipulation to Extend Summary Judgment and Case Management Deadlines is GRANTED:

1. Defendants' dispositive motions for summary judgment shall be filed no later than November 14, 2013;
2. Plaintiff's opposition to Defendants' motions for summary judgment shall be filed no later than December 12, 2013;
3. Defendants' replies shall be filed no later than January 6, 2013;
4. An updated joint Case Management Statement shall be filed by January 23, 2014;
and;
5. The hearing on summary judgment motions and further Case Management Conference shall be set for January 30, 2014.

IT IS SO ORDERED.

October ¹⁷ ___, 2013.



JUDICIAL AND PROP. ORDER EXTENDING
SUMMARY JUDGMENT AND CASE MGMT.
DEADLINES
CASE NO. C-11-2717 EMC

PROOF OF SERVICE

I, Paula Behrmann, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is Two Embarcadero Center, 28th Floor, San Francisco, California 94111-3823. On October 9, 2013, I served the within document(s):

**JOINT STIPULATION AND PROPOSED ORDER EXTENDING
SUMMARY JUDGMENT AND CASE MANAGEMENT DEADLINES**

☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California, addressed as set forth below. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ by causing the document(s) to be emailed or electronically transmitted to the person(s) at the email addresses set forth below, pursuant to a court order or an agreement of the parties to accept service by email or electronic transmission. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 9, 2013, at San Francisco, California.



Paula Behrmann

**JOINT STIPULATION AND PROPOSED ORDER EXTENDING SUMMARY JUDGMENT AND CASE
MANAGEMENT DEADLINES**

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